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Co-Counsel for the Official  
Committee of Unsecured Creditors

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In the Matter of:

SHAPES/ARCH HOLDINGS, L.L.C., et  
al.,

Debtors.

: UNITED STATES BANKRUPTCY COURT  
: FOR THE DISTRICT OF NEW JERSEY  
: HONORABLE GLORIA M. BURNS  
: CASE NO. 08-14631(GMB)

:  
: (Jointly Administered)

:  
: Chapter 11  
:

: **NOTICE OF MOTION OF THE OFFICIAL  
COMMITTEE OF UNSECURED  
CREDITORS FOR ENTRY OF AN ORDER  
APPOINTING A CHAPTER 11 TRUSTEE  
PURSUANT TO 11 U.S.C. §§ 1104 AND  
1106**

HEARING DATE AND TIME:  
May \_\_, 2008 at 10:00 a.m.

**ORAL ARGUMENT REQUESTED**

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that pursuant to an Order Shortening Time entered by the Bankruptcy Court on \_\_\_\_\_, 2008, on May \_\_\_\_, 2008, at 10:00 a.m., or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Official Committee of Unsecured Creditors (the "Committee") of Shapes/Arch Holdings L.L.C., Shapes L.L.C., Delair, L.L.C., Accu-Weld, L.L.C., and Ultra L.L.C., the within debtors and debtors-in-possession, shall move before the Honorable Gloria M. Burns, United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4<sup>th</sup> Floor, Camden, New Jersey 08101, for entry of an Order appointing a Chapter 11 Trustee pursuant to 11 U.S.C. §§ 1104 and 1106 (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying Application, which sets forth the relevant factual and legal bases upon which the requested relief should be granted. A proposed Order granting the requested relief also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be filed in accordance with the Order Shortening Time.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief requested may be granted without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument.

Respectfully submitted,

**HALPERIN BATTAGLIA RAICHT, LLP**

Co-Counsel to the Official Committee of  
Unsecured Creditors

By: /s/ Alan D. Halperin

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Donna H. Lieberman, Esq.

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By: /s/ Michael D. Sirota

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DATED: April 29, 2008